

**RESPONSE TO COMMENTS  
ARNOLD ENGINEERING DEVELOPMENT CENTER  
ARNOLD AIR FORCE BASE, TN**

This document has been prepared in accordance with Tennessee Rule 1200-1-11-.07(7)(j). It has resulted from the Tennessee Division of Solid Waste Management's issuance of a final permit (renewal) to Arnold Engineering Development Center, located at 100 Kindel Drive, Suite A-303, Arnold Air Force Base, TN 37389-1303, EPA Identification Number TN8 57 002 4044. The permit conditions allow the operation and maintenance of container storage units at Arnold Engineering Development Center (AEDC).

Part A of this document describes the efforts made by the Tennessee Division of Solid Waste Management (DSWM) to obtain public input. Part B summarizes and responds to all significant comments received.

**A. Public Involvement Opportunities**

AEDC submitted Part A and Part B hazardous waste management permit applications on May 25, 2004, thus enabling the facility to continue to operate under the current permit until a final decision is made. The receipt of the renewal application was public noticed on June 21, 2004. AEDC also held a Pre-Application Public Meeting on April 20, 2004, which was public noticed on March 17, 2004, as required by Tennessee Rule 1200-1-11-.07(2)(c)3(i). No comments were received at this meeting.

The Division of Solid Waste Management (DSWM) issued a public notice of the issuance of the draft permit and it was public noticed by Arnold Engineering Development Center, edition of the Tallahoma News and Guardian on July 30, 2008, and the Herald – Chronicle on July 29, 2008. Several (30 second) announcements of the action referencing the notice published in the newspaper were provided over two local radio stations (WMRS (AM) 1320, Tallahoma & WCDT (AM) 1340, Tallahoma). The Public Notice advised the community that copies of Arnold Engineering Development Center's application, the draft permit, and fact sheet were available for public inspection at the: Coffee County Lannom Memorial Library, 312 N. Collins Street, Tallahoma, TN (telephone 931-455-2460); TDEC Columbia Field Office, Public Access Area, 2484 Park Plus Drive, Columbia, Tennessee 384011 (telephone 931-380-3371). The notice also established a 45-day public comment period (ending September 15, 2008) and described how interested person(s) could comment in writing on the proposed action. It further described that any interested person could obtain further information. A public hearing was not requested.

**B. Public Comment/Response Summary**

The only comments received were from Arnold Engineering Development Center. These comments are addressed below.

**Comments from Arnold Engineering Development Center**

1. **Comment:** In Paragraph II.D.2, "It is our understanding that signs should only be posted on exterior entry doors to the facility not interior storage bay doors. Please clarify."

**Response:** Yes, the signs shall be posted on the exterior entry doors.

2. **Comment:** In Attachment 2, Waste Analysis Plan, the Section Test Methods, add the words “but is not limited to the following” after the words analysis includes.

**Response:** The change has been made.

3. **Comment:** In Attachment 8, Section Basic Parameters, Dimensions, and Material of Construction, change the first sentence in the second paragraph to read as follows: “Rooms 1001, 1002, 1003, 1004, 1006, and 1007 of Building 1456 will be used for storage of regulated hazardous waste”; delete the second sentence, it may lead to confusion; and change the third sentence to read “Room 1007 may also be used to store PCBs or hazardous material.” AEDC requested to store hazardous waste in Room 1007. The storage capacity/volume numbers include room 1007.

**Response:** The changes have been made.

4. **Comment:** In Attachment 6, the Contingency Plan, insert the revised Figure 6.1. The AEDC Spill Response Equipment and AEDC Fire Department is not pointed at the right locations. Should we submit a corrected figure?

**Response from TDEC:** The corrected figure has been received and the revised Figure 6.1 has been placed in the permit.

#### **Comments from the Division**

1. **Comment:** The Table of Contents has been revised, IV. Specific Conditions for Corrective Action changed L. to read Alternative Corrective Action Process; M. to read Approval/Disapproval of Submittals; and added N. to read Dispute Resolution.
2. **Comment:** In Attachment 3, Security has been revised, Subsection Barrier, Figure 3.1 is not in Attachment 12 Drawings. Figure 3.1 is in Attachment 3.
3. **Comment:** In Attachment 8, Container Management has been revised, renumbered all the Figures and added Figure 8.7.
4. **Comment:** In Attachment 12, Drawings has been revised, renumbered and renamed all the Figures.
5. **Comment:** All references to permit Section III in the Corrective Action Compliance Schedule of Attachment 9.4 and in the first paragraph of Attachment 9.5, Screening Levels have been changed to reference permit Section IV.
6. **Comment:** Paragraph II.D of Attachment 9 has been changed. The reference to Section III of Attachment 10 has been changed to reference Paragraph I.B of Attachment 11, Groundwater Containment.